



Modern Slavery Statement – May 2025

Introduction

This is the Modern Slavery and Human Trafficking statement of Sonoco Holdings UK Limited made on behalf of Sonoco Holdings UK Limited and all its UK subsidiaries (the “**Sonoco UK Group**,” “**we**” or “**us**”). This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (the “Act”) and has been adopted by all subsidiaries as their respective slavery and human trafficking statement of the financial year ending December 2024.

During 2024, we have continued to work towards eradicating the risk of modern slavery in our supply chains and operations. This statement sets out the steps that the companies within the Sonoco UK Group have taken and continue to take to ensure that modern slavery or human trafficking is not taking place within their business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Sonoco UK Group takes a zero-tolerance approach to any form of modern slavery. We recognise that Modern Slavery is a growing global issue. The Sonoco UK Group is committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within our businesses and/or supply chains.

Organisation Structure

Sonoco Holdings UK Limited is a subsidiary of Sonoco Products Company (collectively, with Sonoco UK Group and other subsidiaries of Sonoco Products Company, the “**Sonoco Group**” or “**Sonoco**”), an integrated packaging solutions organisation, creating unique customer experiences and enhancing the quality of products around the world.

The Sonoco Group employs approximately 23,400 employees across more than 285 operations in 40 countries.

Sonoco Holdings UK Limited

Sonoco Holdings UK Limited (and its subsidiary companies) employ approximately 700 people in the UK.

Sonoco Holdings UK Limited is a private limited company registered in England and Wales (Company 03739940) and is the parent company of all the Sonoco Group's subsidiaries in the UK, namely:

- Sonoco Limited 00081296
- Sonoco Cores and Paper Limited 05133800
- Laminar Medica Limited 01233986

In the previous reporting year, Sonoco Holdings UK Limited also voluntarily reported on behalf of Sonoco TEQ Limited. However, as Sonoco TEQ Limited does not meet the £36 million turnover threshold and was divested in April 2025, it is not included in this year's statement.

Sonoco Holdings UK Limited is a wholly owned subsidiary of Sonoco Products Company, which is incorporated in the United States of America.

Sonoco Limited is the primary trading entity for the Sonoco Group and operates in the UK and Ireland.

This statement is intended to satisfy the requirements of Section 54, Part 6 of the Modern Slavery Act 2015 (“the Act”) and applies to Sonoco Limited and Sonoco Cores and Paper Limited.



The Sonoco UK Group had a global annual turnover of approximately £111.9m from the following subdivisions:

- Sonoco Limited has an annual turnover of approximately £66.1m
- Sonoco Cores and Paper Limited has an annual turnover of approximately £41.2m.
- Laminar Medica Limited has an annual turnover of less than the £36m and is included as part of this statement on a voluntary basis.

Supply Chains

The Sonoco UK Group has approximately 1,000 total suppliers, with 100 suppliers making up the top 80% of spend. In addition to managing these suppliers, our category management teams maintain relationships with strategic second tier suppliers in paper categories that feed both our laminates and labels spend. The key material categories are:

- Paper
- Laminates (made of a combination of paper, adhesives, aluminium, and resins)
- Labels (Printed mainly on the above)
- Materials (tinplate for container ends)
- Resins (for the self-manufacture of plastic components)
- Plastic components from third parties

Policies

The Sonoco UK Group is committed to preventing modern slavery and human trafficking in its supply chains. We recognise that our suppliers are fundamental to our success and maintaining the positive reputation of all Sonoco UK brands. Pursuant to this, we require our suppliers to adhere to our business practices and ethical standards.

Policy on Business Conduct

The Sonoco Group's Policies on Business Conduct (the "**Policies**") are the foundation of our companies' policies and set out guiding principles on professional conduct. The Policies apply to all Sonoco employees (including those engaged by the Sonoco UK Group) and set out guiding principles on professional conduct establishing that Sonoco employees should always act lawfully, ethically, and in the best interests of Sonoco in performing their job duties. Sonoco is committed to the core values of honesty, integrity, and accountability. This commitment requires that employees and directors of Sonoco comply fully with all laws, rules and regulations that apply to Sonoco's business operations, and that they act honestly and ethically. Our Policies are available on our [website](#).

Supplier Standards

Sonoco's Supplier Standards detail the requirements and expectations Sonoco has of their suppliers, their supply chains, and any of their contractors with whom they engage. Sonoco expects our suppliers to comply with all applicable legal requirements in the jurisdictions in which they operate and to consistently monitor and enforce Sonoco's Supplier Standards in their own operations and supply chains. Sonoco's Supplier Standards also set forth our principles of environmental awareness, non-discrimination, diversity, human rights, inclusivity, and accountability. Sonoco requires all suppliers to commit to our Supplier Standards as a condition of doing business with us.

Sonoco's Supplier Standards confirm respect for human rights as a basic tenet of Sonoco's beliefs, and its commitment to principles including (i) the elimination of forced or compulsory labour and human trafficking, (ii) the establishment and maintenance of fair and safe work environments, and (iii) the requirement that all suppliers operate such that employee working hours are in compliance with local standards as well as local and national laws and regulations of the applicable jurisdiction. Under the Supplier Standards, Sonoco will not work with any suppliers who require employees to work in excess of statutory limitations without proper compensation as required by applicable law. Further, Sonoco condemns all forms of exploitation of children and forbids the use of children in the workforce. Suppliers

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are forbidden from recruiting child labour, and all supplier employees are required to be above the legal employment age in the country of their employment.

We review our Supplier Standards on a periodic basis to ensure that this policy is in line with current best practices. Our Supplier Standards are available publicly on our website [here](#).

Human Rights Policy

Sonoco's Human Rights Policy outlines Sonoco's commitment to respect human rights standards; specifically, those outlined in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organizations Declaration on Fundamental Principles and Rights at Work. Sonoco's Human Rights Policy applies to all operations of the Sonoco Group, including all divisions, subsidiaries, and affiliated companies as well as all employees, directors, officers, agents, contractors, business partners, vendors, and suppliers of Sonoco. Our Human Rights Policy is available publicly from our website [here](#).

The Human Rights Policy is implemented through Sonoco's business ethics and compliance program, on which all salaried employees are trained. Sonoco's Global Human Rights statement was implemented and is regularly reviewed by the Employee and Public Responsibility Committee of the Board of Directors, while managed by the Legal & Compliance Department under the Office of General Counsel. Sonoco's Internal Audit Department conducts periodic risk assessments and monitors Sonoco's compliance with the Human Rights Policy.

Corporate Sustainability Report

Sonoco's 2024 Corporate Sustainability Report underscores our dedication to sustainable packaging, industry leadership, and employee wellbeing. Our sustainability initiatives in energy efficiency, renewable energy, waste reduction, and water management aim to significantly reduce greenhouse gas emissions. We strive to promote strong human rights and ethical procurement practices in our supply chains by setting clear supply chain expectations and complying with legal protocols set forth in laws such as the California Transparency in Supply Chains Act and the conflict minerals requirements under the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act. For employees, we promote well-being, and career development through extensive training programs and fair practices. The full report can be found on our website [here](#).

Due Diligence

Assessment of Modern Slavery risk within our supply chain

The Sonoco Group completed a Human Rights Risk Assessment (the "2023 Assessment") to monitor compliance with our Human Rights Policy in accordance with methodologies informed by the United Nations Guiding Principles on Business and Human Rights, the International Labor Organization, and the U.S. Department of State's Bureau of Democracy, Human Rights, and Labor. The 2023 Assessment focused on ensuring the following: (i) fair and safe work environment, (ii) the rights of children and the abolition of child labour, (iii) prohibiting forced or compulsory labour and human trafficking, (iv) non-discrimination, (v) freedom of association and collective bargaining; and (iv) indigenous people's rights. The 2023 Assessment included interviews covering broad topics, including human rights risks and priorities, policy and awareness, risk mitigation efforts and supplier due diligence. We intend to review our risk assessment (and update it if necessary) in 2026.

In connection with the 2023 Assessment, the Sonoco Group also sampled a selection of 20 suppliers to assess the nature and extent of due diligence, onboarding, and procedures as they relate to human rights. This included review of current supplier contracts, attestations of suppliers to the Supplier Standards, recent bidding or due diligence activities, and any publicized human rights violations related to the supplier.

Due diligence processes and contractual controls

We have in place systems and procedures designed to:

- Perform due diligence on our existing and potential suppliers.



- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains; and
- Protect whistleblowers.

By way of examples:

Supplier Onboarding: Every supplier must review and adhere to our Sonoco Supplier Standards before they can become a supplier of Sonoco.

Memberships and affiliations: A number of Sonoco UK Group sites operate in accordance with the Ethical Trading Initiative Base Code. In addition, two Sonoco Limited plants (located in Chesterfield and Bradford) and two Sonoco Cores and Paper Limited plants (Jarrow T&C and Stainland Paper) hold membership with SEDEX (the Supplier Ethical Data Exchange). Each site has a minimum SAQ score of 4 and are periodically, independently audited to ensure our systems and standards are legally compliant, fit for our business and are sufficiently maintained. Most recently, the Sonoco UK Group underwent a SEDEX Members Ethical Trade Audit ("SMETA") at its manufacturing location in Bradford in September of 2024.

Confidential reporting processes: We encourage our workforce to report any related concerns in confidence and provide our employees with access to an independent whistleblowing call line, administered by an external provider, in addition to reports made to Sonoco's Legal and Compliance Office who are a designated internal department within Sonoco for receiving, investigating, and providing follow-up for any reports of suspected wrongdoing. We are committed to dealing with any suspected breaches of the Act seriously and with urgency. We are committed to reviewing this statement annually and shall continuously work to improve our systems and policies.

Contractual controls and audit: Our standard supplier contracts afford us the right to perform audits and inspect our supplier's facilities and processes.

Right to work checks: As part of internal due diligence practices, we have measures in place to ensure there is no slavery within our own workforce. Before onboarding a new employee, we require evidence of right to work in the UK.

Risk Assessment and Management

We recognise that we may be indirectly linked to a risk of modern slavery because of our business activities in the manufacturing and packaging industry, and that certain sectors in our supply chain (including the provision of materials, contractors, and labour) may pose a higher risk of modern slavery. Sonoco has established various policies and procedures designed to identify, assess, and manage supplier risk. To assess the risk of forced labour and child labour in our business and supply chains, we conduct risk assessments and review data provided by customers and suppliers. To identify the business activities with the greatest exposure to these risks, we consider the following factors:

- Reliance on low skilled workforce;
- Presence of migrant workers;
- Long, complex, or non-transparent supply chains; and
- Jurisdictional risks including poverty, conflict, and enforcement of international human rights standards.

Sonoco seeks to manage modern slavery risks through a variety of policies, processes, and practices. Some examples are detailed below.

Third-Party Human Rights Risk Management Dashboard

In 2024, Sonoco implemented a third-party human rights risk management dashboard to more closely monitor compliance with our Supplier Standards. The dashboard uses insights from Freedom House, a



nonprofit organization that rates access to political rights and civil liberties in 210 countries and territories through its annual Freedom in the World report. We use the dashboard to identify suppliers located in countries or territories rated as "partially free" or "not free," that may be asked to review and agree to our Supplier Standards on a more frequent basis than those located in countries rated as "free." By monitoring the risk profiles of our most significant supplier relationships on an ongoing basis, we can communicate transparently with customers and other stakeholders about human rights conditions in our value chain.

Third Party Risk Management Program

As part of our third-party risk management (TPRM) program, Sonoco Group leverages external data monitoring and reporting capabilities through a managed third-party solution. A component of this service aggregates data from a variety of leading data providers to monitor various risks, including Cybersecurity, Financial, Ecosystem, Geopolitical, and Compliance. Through our Compliance risk monitoring, we have insight into Sanctions, Enforcement Actions, Adverse Media, and Politically Exposed Persons (PEPs). This information is refreshed on a monthly basis. Incidents of modern slavery may be identified through monitoring of Sanctions, Enforcement Actions, and Adverse Media. If modern slavery issues are identified in our supply chain, the issues are communicated to an appropriate level of Sonoco management for awareness and to determine the best next course of action. In our risk rating methodology, human rights violations or related issues (which include instances of modern slavery) are assigned a Very High risk rating. This is the most severe risk rating used in our risk methodology and will follow the most extensive and urgent escalation procedures to relevant Sonoco management.

Our Commitments

Steps to Prevent and Reduce Risks of Forced and Child Labour

Sonoco has taken the following steps to prevent and reduce risks of forced and child labour:

- Conducting an internal assessment of risks of forced labour and/or child labour in our operations and supply chains;
- Developing and implementing an action plan for addressing any identified instances of forced labour and/or child labour;
- Gathering information on worker recruitment practices and maintaining internal controls to ensure that all workers are recruited voluntarily;
- Evaluating whether any practices in our operations and supply chains increase the risk of forced labour and/or child labour and addressing any such practices;
- Developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in our operations and supply chains;
- Carrying out a prioritization exercise to focus due diligence efforts on the most severe risks of forced and child labour;
- Developing and implementing child protection policies and processes;
- Developing and implementing anti-forced labour and/or child labour contractual clauses;
- Developing and implementing anti-forced labour and/or child labour standards, codes of conduct and/or compliance checklists;
- Incorporating modern slavery and human rights topics into our annual Code of Conduct training for all salaried employees and committing to incorporate these topics in future trainings;
- Auditing and monitoring suppliers;
- Enacting measures to provide for, or cooperate in, remediation of forced labour and/or child labour;
- Developing and implementing grievance mechanisms; and
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour.

Training



Sonoco requires all employees to acknowledge Sonoco's code of conduct at the time of hiring and requires all salaried employees to participate in annual trainings on Sonoco's code of conduct. Over 98% of Sonoco's salaried employees completed the 2024 annual Code of Conduct training which covered topics including modern slavery, whistleblowing, and global supply chain management.

Further steps

Following a review of the effectiveness of the steps we have taken this year to ensure that there is no slavery or human trafficking in our supply chains we intend to repeat this process and continue to train our employees to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Sonoco UK Group's slavery and human trafficking statement for 2025. It was approved by the Board of Sonoco Cores and Paper Limited on the 6th of August 2025 and by the Board of Sonoco Limited on 6th of August 2025.

This statement will be reviewed, and updated, as necessary on an annual basis.

Signed on Behalf of Sonoco Limited:

A handwritten signature in blue ink, appearing to read 'Tim Nash', written over a horizontal line.

Tim Nash
Vice President, Finance – Global RPC
Date:

**Signed on Behalf of Sonoco Cores
and Paper Limited:**

A handwritten signature in blue ink, appearing to read 'Adam Wood', written over a horizontal line.

Adam Wood
Vice President, Paper Products – Europe
Date: